

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

RICHARD A. GORMAN,

Plaintiff,

-against-

ILLYA SHPETRIK,

Defendant.

Civil Action No. 2:20-cv-04759-JCJ

MOTION TO DISMISS

Defendant Illya Shpetrik, (“Defendant”) by and through his undersigned counsel, respectfully moves the Court to dismiss this lawsuit and all counts against him under Rules 8 and 12(b)(2), 12(b)(5) and 12(b)(6) of the Federal Rules of Civil Procedure; and grant all such further relief as the Court may deem just and proper. Defendant concurrently files herewith a Memorandum of Law and a Declaration in support of this Motion, and incorporates both herein.

Dated: April 26, 2021

By: /s/ Matthew Faranda-Diedrich
Matthew Faranda-Diedrich, Esquire
ROYER COOPER COHEN BRAUNFELD LLC
PA Id. No. 203541
Two Logan Square
100 N. 18th St., Suite 710
Philadelphia, PA 19103
Telephone 267-546-0275; Fax 484-362-2630
mfd@rccblaw.com

By: /s/ Matthew J. Press
Matthew J. Press, Esquire*
PRESS KORAL LLP
641 Lexington Avenue, 13th Floor
New York, New York 10022
Telephone (212) 922-1111; Fax (347) 342-3882
mpress@presskoral.com

**Admitted Pro Hac Vice*

Counsel to Defendant Illya Shpetrik

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

RICHARD A. GORMAN,

Plaintiff,

V.

ILYA SHPETRIK,

Defendant.

Case No.: 2:20-cv-04759-JCJ

I hereby certify that a true and correct copy of the foregoing Motion to Dismiss First Amended Complaint and accompany documents has been filed electronically and is available for viewing and downloading from the ECF system to all counsel of record.

Dated: April 26, 2021

/s/ Matthew Faranda-Diedrich

Matthew Faranda-Diedrich, Esquire